

April 21, 2023

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS

VERDICT FORM

BY: Jennifer Clark
DEPUTY

In answering the following questions, you are to follow the instructions I have given you in the Court's charge. Your answers to each question must be unanimous.

As used herein:

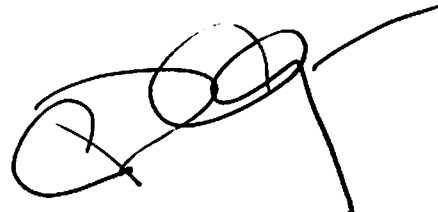
"Textron Innovations" refers to Plaintiff Textron Innovations, Inc.

"DJI" refers to Defendants SZ DJI Technology Co., Ltd.; DJI Europe B.V.; SZ DJI Baiwang Technology Co. Ltd.; and iFlight Technology Company Ltd

The "'909 Patent" refers to U.S. Patent No. 8,014,909.

The "'752 Patent" refers to U.S. Patent No. 9,162,752.

The "Asserted Claims" refers collectively to Claims 1, 7, 10, and 11 of the '909 Patent; and Claim 13 of the '752 Patent.


4/21/23
252 PM

I. INFRINGEMENT**Directions – Question No. 1**

In answering the Questions below, please mark either “Yes” or “No” for each listed asserted claim in the spaces provided.

Question No. 1: Did Textron Innovations prove by a preponderance of the evidence that DJI directly infringed the following Asserted Claims?

“YES” is a finding for Textron Innovations. “NO” is a finding for DJI.

<u>'909 Patent</u>	Claim 1:	YES <u>✓</u>	NO <u> </u>
	Claim 7:	YES <u>✓</u>	NO <u> </u>
	Claim 10:	YES <u>✓</u>	NO <u> </u>
	Claim 11:	YES <u>✓</u>	NO <u> </u>
<u>'752 Patent</u>	Claim 13:	YES <u>✓</u>	NO <u> </u>

Please proceed to Question No. 2.

Directions – Question No. 2

In answering the Questions below, please mark either “Yes” or “No” for each listed asserted claim in the spaces provided.

Question No. 2: Did Textron Innovations prove by a preponderance of the evidence that DJI actively induced infringement of the following Asserted Claims?

“YES” is a finding for Textron Innovations. “NO” is a finding for DJI.

<u>'909 Patent</u>	Claim 1:	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
	Claim 7:	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
	Claim 10:	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
	Claim 11:	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
<u>'752 Patent</u>	Claim 13:	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>

Please proceed to Question No. 3.

Directions – Question No. 3

For any patent that the answer to Question 1 **OR** Question 2 was YES, please proceed to answer the following question.

Question No. 3A: Did Textron Innovations prove by a preponderance of the evidence that DJI's infringement of the '909 Patent was willful?

"YES" is a finding for Textron Innovations. "NO" is a finding for DJI.

YES ☒ NO ☐

Question No. 3B: Did Textron Innovations prove by a preponderance of the evidence that DJI's infringement of the '752 Patent was willful?

"YES" is a finding for Textron Innovations. "NO" is a finding for DJI.

YES ☒ NO ☐

Please proceed to Question No. 4.

II. INVALIDITY**Directions – Question No. 4**

In answering the Question below, please mark either “Yes” or “No” for each listed asserted claim in the spaces provided.

Question No. 4: Did DJI prove by clear and convincing evidence that the following Asserted Claims are invalid?

“YES” is a finding for DJI. “NO” is a finding for Textron Innovations.

<u>'909 Patent</u>	Claim 1:	YES _____	NO <u>✓</u>
	Claim 7:	YES _____	NO <u>✓</u>
	Claim 10:	YES _____	NO <u>✓</u>
	Claim 11:	YES _____	NO <u>✓</u>
<u>'752 Patent</u>	Claim 13:	YES _____	NO <u>✓</u>

Please proceed to Question No. 5.

III. DAMAGES

Answer Question 5 only if there is at least one Asserted Claim for which you answered "YES" in Question 1 **OR** Question 2, **AND** you answered "NO" for the same Asserted Claim in Question 4.

Directions – Question No. 5

For Question No. 5, provide a dollar amount in the space provided.

Question No. 5: What sum of money has Textron Innovations proven by a preponderance of the evidence would fairly and reasonably compensate Textron Innovations for any infringement of the Asserted Claim(s) by DJI?

For the '909 Patent: \$ 30.7 million

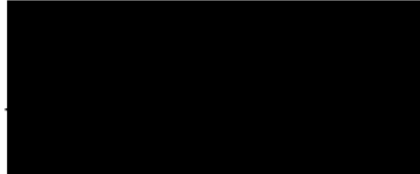
For the '752 Patent: \$ 248.2 million

You have now reached the end of the Verdict Form and should review it to ensure it accurately reflects your unanimous determinations. The Jury Foreperson should then sign and date the Verdict Form in the spaces below. Once this is done, notify the Court Security Officer that you have reached a verdict. The Jury Foreperson should keep the Verdict Form and bring it when the jury is brought back into the courtroom.

I certify that the jury unanimously concurs in every element of the above verdict.

Date: 4.21.23

Signature: _____

A black rectangular box redacting the signature of the jury foreperson.